

STATE OF MISSOURI

McGuinnis, Governor • David A. Starr, Director

DEPARTMENT OF NATURAL RESOURCES



DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

NOV 30 1995

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CERTIFIED MAIL: Z 062 477 420
RETURN RECEIPT REQUESTED

Mr. Joe Lopez
Engineer, Air Quality Section
Kansas City Health Department
Air Quality Section
21st Floor, City Hall
414 E. 12th Street
Kansas City, MO 64106

Dear Mr. Lopez:

The APCP (Air Pollution Control Program) has reviewed your November 3, 1995 letter that addresses issues concerning small parts washers. It was indicated in your letter that you do not feel that 10 CSR 10-2.210, "Control of Emissions From Solvent Metal Cleaning" should apply to small parts washers.

Missouri State Rule 10 CSR 10-2.210 (1)(B) states that the regulation shall apply to all installations which emit volatile organic compounds from solvent metal cleaning or degreasing operations. 10 CSR 10-2.210 (1)(C) states that the regulation applies to all processes which use cold cleaners, open-top vapor degreasers or conveyORIZED degreasers, using nonaqueous solvents to clean and remove soils from metal surfaces. The solvent metal cleaning rule includes all sizes of parts cleaners, therefore, the rule applies to small parts washers.

Although future NSPS (New Source Performance Standards) may exempt small parts cleaners, the rule was developed to meet air quality standards in certain areas of the state. Therefore, in our opinion, the objective of NSPS is different from the state rule.

Mr. Joe Lopez
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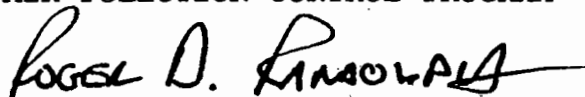
Small parts washers are not required to close the lid during operation. However, the rule requirements must be followed for good housekeeping purposes. These requirements help to reduce emissions. For example, if the small parts washers were exempted from the solvent metal cleaning rule, facilities would not be required to drain the parts prior to removal from the washer as stated under "Operating Procedures." If facilities do not drain the parts prior to removal, emissions would increase.

The APCP does not believe that the intention of Missouri State Rule 10 CSR 10-2.210 is to exempt remote reservoir cleaners from the cold cleaner rule. Therefore, we do not feel that enforcement of these sources should be waived.

If you have any questions or comments, you may contact Jennifer Webb at (314) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Roger D. Randolph
Director

RDR:jwp

c: Richard Vani, Kansas City Regional Office
David Bradford, St. Louis Regional Office
Ron Steinkamp, City of St. Louis
Charles Wildt, St. Louis County